

March 12, 2019

United Systems, Inc 5700 N Portland, Suite 201 Oklahoma City, OK 73112

Contact: Alvin Myers Phone: 405-778-8305 Title: President/COO

SPIN: 143004698

Dear FCC Reviewer,

I am sending this letter as supplemental information to our Request for Waiver of the Invoicing Deadline filed February 20, 2019 and referenced as follows:

Confirmation #: 20190220041717567

Proceeding: 02-6

Seiling Indep School Dist 8

FRN: 1799087372 Form 471: 171037046

United Systems, Inc has been a Service Provider participating in the USAC-SLD USF program since the program's inception. During this long period, I can only find one time previous that we have requested a Waiver of the Rules, and that was due to circumstances outside of our control. I only mention this to exhibit that we take great measures internally to meet deadlines, request extensions of the deadlines and comply with rules of the program, and, generally be good stewards of the program.

This request was made due to what we would consider extraordinary circumstances. The products and services related to this FRN were tied to a construction project that was significantly delayed and required a "construction progress invoicing approach", which is outside of our normal invoicing process, including invoicing to USAC-SLD. Construction progress invoicing uses percentages of completion rather than specific details for invoicing, in other words it is just an amount with no product or services detail. The USAC-SLD components were tracked separately for delivery and installation, but the detailed invoice was never processed when that part of the project was completed. Our Project Manager overseeing this process and



the related invoicing was relatively new to our company and is not familiar with the USAC-SLD USF program, so he did not realize the USAC-SLD invoice needed to be processed against a deadline.

I would also like to point out that this issue was identified just 22 days after the original invoice deadline date. This timing was in line with the phase 1 completion of the construction project when we were reconciling detailed product and services information to our progress invoicing.

If this Waiver is not granted, it will place a significant financial hardship on either our company, which is a Small Business entity and employs 30 people, or the applicant who is a rural school district trying to manage limited budget resources.

We respectfully request that the Waiver is granted with an invoice deadline extension date that would allow us to get the invoice submitted and processed.

If you do have any concerns or questions about this request, please feel free to contact me directly at 405-778-8305, or by email at amyers@unitedsystemsok.com.

Thank you for your consideration of our request.

Sincerely,

Alvin Myers

President and Chief Operating Officer